

# Rickner PLLC

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December 2, 2024

**Via ECF**

Hon. Kenneth M. Karas  
United States District Judge  
Federal Building and United States Courthouse  
300 Quarropas St.  
White Plains, NY 10601-4150

Re: Notice of Appearance — *Cooper v. Greene Haven*, 24 cv 01128

Your Honor:

This office has been retained by Plaintiff Tyrone Cooper to represent him in the above-captioned action. We write to respectfully request that the Court's June 10, 2024 *Valentin* Order (Dkt. 7) be kept in place to assist the parties in identifying the proper Defendants in this action.

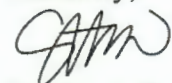
Mr. Cooper filed this case, *pro se*, on February 12, 2024 (Dkt. 1), seeking damages pursuant to 42 U.S.C. § 1983 for violations of his constitutional and statutory rights arising from the cutting of his dreadlocks during reception into the New York State Department of Corrections and Community Supervision ("DOCCS"). Plaintiff, who is Rastafarian, had a signed Court order prohibiting DOCCS from cutting his hair. Staff ignored this order, and its own internal written policies, and forced Plaintiff to have his head shaved on or about November 28, 2023.

Plaintiff filed this suit against the facility in which his hair was cut, Green Haven, and on June 10, 2024, Your Honor entered an order dismissing this improper party and directing the Office of the Attorney General ("AG") to investigate and identify the involved DOCCS staff members pursuant to *Valentin v. Dinkins*, 121 F.3d 72 (2d Cir. 1997).

While Plaintiff will no longer be proceeding *pro se*, we believe that leaving the *Valentin* order in place will expedite joinder of the proper individual defendants in this action. Because our office was retained post-filing, we are in the early stages of gathering documents and information pursuant to our Rule 11 duties. In order to keep this case moving and avoid any unnecessary delay, we respectfully request that the Court keep the *Valentin* Order in place, but direct the AG's office to communicate the results of their investigation directly to undersigned counsel, at which point we will promptly file and serve an amended complaint on Mr. Cooper's behalf.

We thank the Court for its time and consideration of this request.

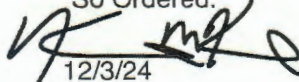
Sincerely,



Stephanie Panousieris  
Attorney for Plaintiff

This application makes eminent sense and is therefore granted.

So Ordered.

  
12/3/24